

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

RETHINK35, et al.

Plaintiffs,

V.

TEXAS DEPARTMENT OF
TRANSPORTATION,

Defendant.

§ § § § § § § § § § § § § § § §

CIVIL ACTION NO. 1:24-CV-00092-DII

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

TO THE HONORABLE JUDGE OF THE DISTRICT COURT:

COMES NOW, Defendant, Texas Department of Transportation (“TxDOT”), and moves the Court to allow the withdrawal of its counsel, Aidan Read, and in support thereof would respectfully show the following:

1. Defendant requests that Aidan Read be withdrawn as attorney of record for Defendant.
2. Defendant seeks an order granting his withdrawal as attorney of record for good cause as Aidan Read is no longer employed with the Transportation Division of the Office of the Attorney General.
3. Defendant remains represented by the Texas Office of the Attorney General and Bates PLLC. Lisa McClain Mitchell, Matt Gamboa-Lutz, Luke Hill, and Ryan P. Bates will continue to represent Defendant in this matter.

4. This withdrawal of counsel is not made for reasons of delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant moves the Court for an order permitting Aidan Read to withdraw as its counsel, and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

AUSTIN KINGHORN
Deputy Attorney General for Civil Litigation

NANETTE M. DINUNZIO
Chief, Transportation Division

/s/ Aidan Read
LISA MCCLAIN MITCHELL
Attorney in Charge
Texas Bar No. 90001724
Email: lisa.mitchell@oag.texas.gov
MATT GAMBOA-LUTZ
Admitted Pro Hac Vice
Texas Bar No. 24136935
Email: matt.gamboa-lutz@oag.texas.gov
AIDAN READ
Admitted Pro Hac Vice
Texas Bar No. 24138747
Email: aidan.read@oag.texas.gov

LUKE W. HILL
Texas Bar No. 24132607
Email: luke.hill@oag.texas.gov
Assistant Attorneys General
Transportation Division
P.O. Box 12548
Austin, Texas 78711-2548
Telephone: (512) 936-1431
Facsimile: (512) 936-0888

RYAN P. BATES
Texas Bar No. 24055152
Bates PLLC
919 Congress Avenue, Suite 1305
Austin, Texas 78701
Telephone: (512) 694-5268
Email: rbates@batespllc.com

ATTORNEYS FOR DEFENDANT,
TEXAS DEPARTMENT OF
TRANSPORTATION

CERTIFICATE OF SERVICE

I certify that on March 14, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically notify via email all counsel of record.

/s/ Lisa McClain Mitchell
LISA MCCLAIN MITCHELL
ASSISTANT ATTORNEY GENERAL